



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 03 2015

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7011 1150 0000 2639 5346
RETURN RECEIPT REQUESTED

Mark Houser, Plant Manager
Cloyes Gear and Products
1152 Frontenac Road
Naperville, Illinois 60563

Subject: Information Request
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)
Docket No. V-W-15-308-1

Dear Mr. Houser:

The U. S. Environmental Protection Agency is requiring Cloyes Gear and Products (Cloyes or you) to submit certain information about the facility located at 1152 Frontenac Road in Naperville, Illinois. The enclosed Information Request specifies the information that you must submit. You are required to submit this information within 45 calendar days after you receive this request unless otherwise stated in the Requests for Information section of the attached Information Request.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

In accordance with Section V, Paragraph 2 of the Information Request, you must include with your response a statement certifying that all information you submit is true and accurate to the best of your knowledge and belief using the certification language provided in that paragraph. Any questions that do not directly relate to your facility's operations can be addressed with "not applicable" and a brief explanation.

Please exercise care to assure that responses are complete and accurate because Section 309(c)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.

You must submit a written response, with the information requested in the enclosure, within the timeframes specified to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Michelle Heger, Environmental Engineer

Thank you for your cooperation in this matter. Should you have any questions, please contact Michelle Heger of my staff by telephone at (312) 886-4510 or by e-mail at heger.michelle@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'DM', with a long horizontal flourish extending to the right.

Dean Maraldo, Chief
Water Enforcement and Compliance Assurance Branch

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Cloyes Gear and Products, Inc.
(d.b.a. The Mesh Company)

) Docket No. V-W-15-308-1
)
)
) Proceeding under Section 308(a) of
) the Clean Water Act, as amended,
) 33 U.S.C. § 1318(a)
)

INFORMATION REQUEST

I. STATUTORY AUTHORITY

1. The U.S. Environmental Protection Agency is issuing this Information Request to Cloyes Gear and Products (Cloyes or you) pursuant to the authority vested in the Administrator of EPA by Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA Region 5.
2. Section 308(a) of the Act, 33 U.S.C. § 1318(a), provides, among other things, that whenever required to carry out the objective of this chapter, the Administrator of EPA shall require the owner or operator of any point source to: establish and maintain such records, make such reports, and provide such other information as she may reasonably require.

II. INSTRUCTIONS

1. You must complete each of the requests and submit the required and appropriate documentation specified in this Information Request according to the schedule(s) specified below.
2. Submission instructions are in Section V of this Information Request.
3. Within seven calendar days of your receipt of this Information Request, you must notify EPA, in writing, as to whether you intend to comply with this Request.
4. If you do not have documents responsive to a particular request, state in your written response that you do not have responsive documents.
5. You must keep all Records reviewed or generated in the course of responding to this Information Request until EPA informs you in writing that you are no longer required to keep the Records, or for five years, whichever is sooner.

III. DEFINITIONS

All terms used in this information request have their ordinary meaning unless such terms are defined in the CWA, 33 U.S.C. 1251 *et seq.*, or 40 C.F.R. Part 403, Part 433, Subpart A, and Part 471.

1. "Day" or "days" means a calendar day unless expressly stated to be a working day. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of business on the next working day.
2. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
3. "Record" means any recording of information in tangible or intangible form. It includes, but is not limited to: documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer printouts, and computer databases.
4. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
5. "You" for purposes of this Information Request refers to Cloyes Gear and Products (Cloyes) and to any agents, employees, contractors, or other entities that perform work or act in any way on behalf of, or at the direction of, Cloyes.

IV. REQUESTS

Cloyes must submit the following information pursuant to Section 308(a) of the CWA, 33 U.S.C. § 1318(a) within 45 calendar days regarding its facility located at 1152 Frontenac Road, Naperville, Illinois (Facility).

1. Identify the Facility's current and previous owners and/or operators. Include the following: original construction date of Facility; initial operation date of Facility; official names of owners, operators, and other relevant parties; date of ownership change; and circumstances of change in ownership (i.e. bankruptcy, name change, merger, etc.).

2. Provide an up-to-date plot plan of the Facility.
3. Provide an up-to-date block process flow diagram for the Facility that at a minimum includes and labels, but is not limited to, each piece of processing equipment and wastewater treatment equipment, including storage tanks and equipment capacity.
4. Provide a detailed description of the operations at the Facility, including the volume of wastewater produced and discharged.
5. Identify any and all types of metal and their alloys which are processed at the Facility.
6. Provide a detailed narrative description of the wastewater treatment operations at the Facility, including any ability to bypass or divert any portion of the waste stream from or to any portion of the treatment operation.
7. Clearly state and describe whether any of the following operations are performed at the Facility on any basis material:
 - a. Electroplating;
 - b. Electroless plating;
 - c. Anodizing;
 - d. Coating (chromating, phosphating, and coloring);
 - e. Chemical etching and milling; and
 - f. Printed circuit board manufacture.
8. Clearly indicate whether any of the following process operations are performed at the Facility:
 - a. Cleaning, machining, grinding, polishing, tumbling, burnishing, impact deformation, pressure deformation, shearing, heat treating, thermal cutting, welding, brazing, soldering, flame spraying, sand blasting, other abrasive jet machining, electric discharge machining, electrochemical machining, electron beam machining, laser beam machining, plasma arc machining, ultrasonic machining, sintering, laminating, hot dip coating, sputtering, vapor plating, thermal infusion, salt bath descaling, solvent degreasing, paint stripping, painting, electrostatic painting, electropainting, vacuum metalizing, assembly, calibration, testing, and mechanical plating.
9. Provide a copy of all notices and reports submitted to EPA and IEPA on behalf of the Facility pursuant to the Pretreatment standards for the Metal Finishing Point Source Category, at 40 C.F.R. Part 433.
10. Provide any and all documents that include determinations, engineering assessments, and/or associated explanations made regarding applicability of 40 C.F.R. Part 433, Pretreatment standards for the Metal Finishing Point Source Category to any operations or equipment at the Facility.

11. Submit to EPA a summary of all self-monitoring data collected for the Facility from January 2010 to the present.
12. Identify and clearly describe if any of the following metal forming operations are performed at the Facility: rolling, extruding, forging, drawing, swaging, cladding, and tube reducing, and ancillary operations including casting for subsequent forming, heat treatment, surface treatment, alkaline cleaning, solvent degreasing, product testing, surface coating, sawing, grinding, tumbling, burnishing, and wet air pollution control.
13. Provide a copy of all notices and reports submitted to EPA and IEPA on behalf of the Facility pursuant to the Pretreatment standards Nonferrous Metals Forming and Metal Powders Point Source Category, at 40 C.F.R. Part 471.
14. Provide any and all documents that include determinations, engineering assessments, and/or associated explanations made regarding applicability of 40 C.F.R. Part 471, Pretreatment standards Nonferrous Metals Forming and Metal Powders Point Source Category to any operations or equipment at the Facility.

V. SUBMITTALS

1. Submit your response to this Information Request within the time-frame described above to:

Water Enforcement and Compliance Assurance Branch (WC-15J)
Attention: Michelle Heger
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

2. You must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

3. If you find at any time after submitting information to EPA that any portion of the submittal is false or incorrect, you must notify EPA immediately. Knowing submittal of false information to EPA in response to this Information Request may subject you to criminal

prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.

4. You may not withhold information because you claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Information Request, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If you do not assert a claim of business confidentiality when you submit the information, EPA may make the information available to the public without further notice.
5. This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.
6. EPA may use the information submitted in response to this Information Request in an administrative, civil or criminal action.
7. Neither the issuance of this Information Request by EPA nor your compliance with this Information Request relieves you of liability for any penalty, fine, remedy or sanction authorized to be imposed pursuant to Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g), including but not limited to those related to any violations addressed by this Information Request. EPA specifically reserves the right to seek any of the remedies specified in Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g).
8. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).
9. If you have any questions about this Information Request, contact Michelle Heger of my staff by telephone at (312) 886-4510, or via email at heger.michelle@epa.gov.



Dean Maraldo

Chief, Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5

2/3/15
Date